



January 31, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Communication, MB Docket No. 18-214, GN Docket No. 12-268

Dear Ms. Dortch:

On January 30, 2019, Robert Weller and the undersigned, both of the National Association of Broadcasters (NAB), had a telephone conference with staff from the Incentive Auction Task Force and the Media Bureau. A complete list of meeting attendees is copied below. During this meeting, NAB discussed the Commission's proposals for reimbursement of FM radio stations affected by the repacking of full-power television stations following the close of the broadcast spectrum incentive auction.¹

In particular, NAB urged the Commission to consider FM stations eligible for reimbursement even if they are unable to cover 80 percent of their coverage area or population served with auxiliary facilities. While FM stations disrupted by the repack will make every effort to continue to serve their listeners, there may be some instances where stations are unable to secure access to facilities that will allow them to serve 80 percent of their coverage area by the time a repacked television station impacting their operations must move. Those stations should not be ineligible for reimbursement merely because it is impossible for them to replicate 80 percent of their coverage in a timely fashion.

NAB continues to appreciate the efforts of staff to implement rules providing for the reimbursement of bystander FM stations as quickly as possible, and we look forward to continuing to work productively with the Commission to minimize disruption during the repack.

¹ LPTV, TV Translator, and FM Broadcast Station Reimbursement, *Draft Notice of Proposed Rulemaking and Order*, MB Docket No. 18-214, GN Docket No. 12-268, FCC 18-112 (Aug. 3, 2018).

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Patrick McFadden", with a long horizontal flourish extending to the right.

Patrick McFadden
Associate General Counsel,
National Association of Broadcasters

cc: James Bradshaw
Michelle Carey
Hillary DeNigro
Pamela Gallant
Maria Mullarkey
Thomas Nessinger
Jeffrey Neumann